

UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States of America

v.

Alejandro Rene SANCHEZ

Case No.

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of August 25, 2021 in the county of Webb in the
Southern District of Texas, the defendant(s) violated:

Code Section

Offense Description

Title 18 United States Code,
Section 922 (g)(3)

Possession of a Firearm and Ammunition by a Prohibited Person (an unlawful user of a controlled substance as defined in 21 U.S.C. Sec. 802)

Title 18 United States Code Section
922 (n)

Illegal Receipt of a Firearm and Ammunition by a Person Under Indictment

This criminal complaint is based on these facts:

See Attached Sheet...

☒ Continued on the attached sheet.

/s/ Darren Johnson

Complainant's signature

Darren Johnson, ATF Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: 08/30/2021

Judge's signature

City and state: Laredo, Texas

Diana Song Quiroga, U.S. Magistrate Judge

Printed name and title

ATTACHMENT A
(Alejandro Rene Sanchez)

On August 25, 2021 Laredo Police Department (LPD) Officers conducted a traffic stop on a blue in color Mercedes bearing temporary paper tag (hereinafter MERCEDES) for a traffic violation near the intersection of Las Cruces Drive and Old Santa Maria Avenue in Laredo, Texas. The Officer identified the driver as Alejandro Rene SANCHEZ (SANCHEZ), learned that SANCHEZ had active capias warrants, and arrested SANCHEZ on those warrants. The MERCEDES was impounded, searched and inventoried by LPD Officers, who then contacted ATF after discovering a loaded firearm and an extra magazine with ammunition in the back seat:

- GLOCK, Model 43, 9-millimeter pistol bearing serial number ADXB573 (hereinafter GLOCK)

ATF agents interviewed SANCHEZ at the ATF Laredo Field Office. After advisement of rights and waiver, SANCHEZ admitted to being under indictment for Aggravated Robbery, out of the 341st District Court, Webb County, Texas, in Cause No. 2020-CRH-001838-D3. SANCHEZ also admitted to knowing that he cannot possess a firearm while under the indictment. Aggravated Robbery is a felony crime punishable in the State of Texas by imprisonment for a term of more than one year. SANCHEZ further admitted to recently receiving the GLOCK from JESUS GUADALUPE COVARRUBIAS (COVARRUBIAS), who lives at a residence on 11000 block of Sierra Gorda, Laredo, Texas (hereinafter SIERRA GORDA). Earlier in the day, COVARRUBIAS had the GLOCK in the waistband of his pants, removed the GLOCK and handed it to SANCHEZ. COVARRUBIAS also handed an extra magazine to SANCHEZ that contained 9 millimeter ammunition.

SANCHEZ told ATF agents that he has been under felony indictment since April 2021. ATF agents reviewed the Firearm Transaction Record (ATF FORM 4473) and noted that the GLOCK was purchased in June 2021 by a person who lives at the SIERRA GORDA residence.

Furthermore, SANCHEZ informed ATF agents that he is a habitual user of marijuana and is addicted to crack cocaine. SANCHEZ also informed ATF agents that he spends approximately \$30.00 on hydroponically grown marijuana daily.

Preliminary examination of the GLOCK revealed that the firearm was manufactured outside the state of Texas and therefore affected interstate commerce.

Four additional persons were also arrested on firearm charges stemming from the investigation on whom criminal complaints are being contemporaneously filed:

Jose Gerardo Amaro

Roberto Carlos Zamora

Jesus Guadalupe Covarrubias

Felipe Jesus Melendez-Bravo